

In The United States District Court  
Middle District of Pennsylvania

Wm. R. Branch  
Plaintiff

vs.

MR. RUSSIAN, et. al., Defendants

FILED  
HARRISBURG

FEB 20 2004

No. CV 00-1728

MARY E. D'ANDREA CLERK

DEPUTY CLERK

(Judge CONNER)

REPLY to Defendants Brief in opposition To  
Plaintiff motion for Leave to file a Supplemental  
Pleading

Respectfully Sir Rule 15(d) is designed to provide Plaintiff  
with the means to include Transactions or occurrences or Events  
which happened since the date of the pleading!

To me that appears to be clear. in the instant case Retaliation  
is a key Pleading Justice Dictates the need for supplemental  
Pleading as I have been physically attacked By Sgt mcAndrew  
and when I reported it I was called a LIEr and put in the RTU/  
Hole for 90 days, another key Pleading Religious Freedom, again  
the Staff has forced me to cut my hair while I am pleading  
this same issue before this most noble and august tribune  
in so doing they violated the protection the court affords a  
person accessing the court and while the issue was not decided  
and no order written the D.O.C. Staff took matters into their  
own hands.

Exhibit AA-1 in the process they violated their own policy 819-3 Pg 8(a) the  
Pg 1 FCPD is to collect the information for review and send it to the  
Religious accommodation Review Committee, No disciplinary action  
is to be taken until the R A R Committee has forward their decision  
to the Regional Deputy Secretary and finally back to me. I Believe  
that because I am sueing Pastor Gagas and the staff they have  
never sent out my request for a hair exemption, for these  
reasons and many more the court should per F.R.C.P. 15(d)  
allow supplemental pleading along with Rule 56(f) in order  
for me to show "Causal link".

The trial is set for May that is 3 1/2 months away  
that is more than enough time for defense counsel to  
prepare her case, the fact she has asked for a continuance  
because she planned a trip and time was granted shows that

is able To in SURE That Counsel will not Be pReJuDICE  
 By this pleading which Should be liberally GRant as well as  
 Pleadings to be liberally Read. I am not a hawyer and I do not  
 have any Funds for Copying I have asked for Counsel to be  
 appointed and I asked for a JURY TRIAL if I am not assisted  
 By this court when the Government BRINGS it mighty Power  
 down upon me Justice can not Be Served because I have No  
 money OR can not present my ARGUMENTS before this noble  
 COURT, being denied Based upon PROCEDUREl Rules and the  
 COURT does not tell me what I need to get an iNjunction OR  
 a JURY TRIAL OR to avoid Summary JudgeMent!

when the Rights afforded all inmates are beeing denied and  
 Violated by a people Duty bound to protect Said Constitutional  
 Rights. the Courts have already give Great Differance to D.O.C.  
 Employee in preformance of their duty but when it is  
 apparent from the pleading that these people have Violated the  
 TRUST the Courts have placed in said people, chastisement is  
~~not~~ mandated in the ~~not~~ interest of Justice.

Therefore I ask this Auguest, Court to GRant me  
 Supplemental Pleading per Fed. Rules of civil PROCEDURES 15(d) as  
 Counsel has had this Pleading for OVER Two years and at any Time  
 investigated it and prepared for TRIAL per the Date I send it to  
 the COURTS see: COURT Docket Sheet.

Respectfully Sir by the preponderant's of Evidence any  
 Jury would find that the D.O.C. has violated my Rights and has  
 Retaliated against me for accessing the COURTS and used excessive  
 force on me in a Conspiracy to force me to drop my Law Suit's  
 and to Stop Reporting their misconducts. Please send me 7 Marshal  
 FORMS.

Proof of Service

Ms Mosley SD AG STRAWBERRY Sq HARRISBURG Pa. 17120

UNSWORN Declaration

I affirm under penalty of the law that the above is true

Date 2-14-04

William Branch CF-3756

Po Box 256  
 Waymart Pa 18472

Name & No. CF 3756 Branch  
P.O. Box 256  
Waymart, PA 18472-0256

INMATE MAIL  
PA DEPARTMENT OF CORRECTIONS

To: Conner

FILED  
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FEB 20 2004

MARY E. DANDREA, CLERK  
PA DEPT. OF CORRECTIONS

